



American Telemedicine Association

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July 6, 2015

Chairman Tom Wheeler
Federal Communications Commission
445 Twelfth Street, SW
Washington DC 20554

Re: Lifeline and Link Up Reform and Modernization WC Docket No. 11-42

Dear Chairman Wheeler,

The proposed rulemaking referenced above outlines a set of comprehensive proposals to restructure and modernize the FCC's Lifeline program so that it can efficiently and effectively help low-income consumers afford access to essential communications services in the 21st Century, including broadband. One element of that proposal is to establish minimum service standards for both voice and broadband, to ensure that both Lifeline subscribers and ratepayers are getting the best possible value from the service delivered. In essence, this puts forth the idea of expanding the Lifeline program to provide broadband connectivity for all Americans.

The American Telemedicine Association (ATA) endorses this proposal. In our comments to the Commission regarding the proposed National Broadband plan on June 8, 2009 we stated:

Historically, the demands and need for broadband has been different for institutions and for consumers at home or elsewhere. However, emerging health and educational applications, changing patterns in the workforce, office-free employment arrangements, and mobile services have eliminated the distinction between the needs for a hospital, at a bedside or office, on the road or at home. Indeed, the promise of ubiquitous access to broadband is taking healthcare out of the doctor's office to the patient at the time and place of need. Therefore, ATA sees no distinction in the need for broadband based on location and suggests that a national goal should be coast-to-coast, border-to-border. Further, the needs for health communication are two-way: doctor-to-patient and patient-to-doctor. Therefore, goals should be specific as to upstream as well as downstream capabilities. Of course, constructing a timetable associated with meeting national goals may need to take into consideration such factors as geographic location, either the price or level of competition.

As access to health care, health records and health information via telecommunications becomes a cornerstone to the delivery of health care in America, the issue of affordability and access to broadband services becomes even more important. Existing programs such as Lifeline

and Link-Up programs should be expanded to enable low income consumers to gain access to broadband as well as basic telephone service.¹

Today, we reaffirm our position that existing universal service programs such as Lifeline and Link-Up programs should be expanded to enable low income consumers to gain access to broadband, as well as basic telephone service. ATA applauds your proposal and urges the Commission to formally adopt such change this year.

Sincerely,

A handwritten signature in cursive script that reads "Jonathan D. Linkous". The signature is written in dark ink on a light-colored, textured background.

Jonathan D. Linkous
Chief Executive Officer

¹ In the Matter of: A National Broadband Plan for Our Future (GN Docket No. 09-51), Comments of the American Telemedicine Association on The FCC Notice of Inquiry June 8, 2009